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U.S. BANKRUPTCY CT.
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Limited Appearance for Purpose of Objecting to
Motion Attorneys for DRC Citrus Office, LP

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re

Case No. 22-02384-LT11

BORREGO COMMUNITY HEALTH
FOUNDATION

LIMITED OBJECTION/CLARIFICATIONS TO
MOTION TO REJECT LEASES

Debtor and Debtor in Possession.

Hearing

Date: May 16, 2023

Time: 10:00 a.m.

Location: Department 3

DRC Citrus Office, LP, a Delaware limited partnership, a creditor/lessor in the above-captioned
bankruptcy case hereby files its limited objection/clarifications to the Debtor's Motion to Reject Leases
(Docket No. 612):

The unexpired leases as issue are for the properties located at:

1700 Iowa Ave, Suites 280 and 290, Riverside, California 92507; and

1600 Iowa Ave, Suites 210, 220, and 250, Riverside, California 92507 (collectively, the
"Premises").

obj 2384 2P


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2 Contrary to the Motion, the Premises have not been surrendered to the Lessor. The Debtor is
3 still in possession of the same. As a consequence of the same, the Debtor should be required to pay
4 rent as an administrative expense through the date of any order granting the Motion or, at a minimum,
5 through May 1, 2023.

6 It is also requested, that the Debtor be required to surrender all keys, fobs and other access keys
7 or devices for the Premises.

8 Respectfully submitted.

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11 Dated: April 26, 2023

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13 By: _____
14 Alexander Ian Cornelius
15 CORNELIUS & KASENDORF, APC
16 Attorney for DRC Citrus Office, LP
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